

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MITRA DAS, MUKTI  
L. DAS, and TROCA HOLDINGS  
LLC, for themselves, and as assignees  
of BOSTON EAST TYNGSBORO  
HOLDINGS LLC,

Plaintiffs,

v.

THE LOWELL FIVE CENT SAVINGS  
BANK, DAVID WALLACE, and  
JOHN PRATT JR.,

Defendants.

Case 1:24-cv-10931-PBS

**DEFENDANTS' ASSENTED-TO MOTION FOR LEAVE TO FILE REPLY IN SUPPORT  
OF MOTION TO STAY PROCEEDINGS OR IN THE ALTERNATIVE  
EXTEND RESPONSIVE PLEADING DEADLINE**

Pursuant to Local Rule 7.1(b)(3), Defendants, The Lowell Five Cent Savings Bank, David Wallace, and John Pratt, Jr. respectfully move the Court for leave to file a reply brief in support of their Motion to Stay Proceedings or in the Alternative Extend Responsive Pleading Deadline (the "Motion to Stay"), and state as follows:

1. On November 7, 2024, Defendants filed the Motion to Stay. *See* Doc. no. 33.
2. On November 14, 2024, Plaintiffs filed an Opposition to the Motion to Stay. *See* Doc. no. 33.
3. Plaintiffs' recently filed opposition sets forth several legal contentions that merit a brief response by Defendants so that the Court can be fully briefed on the issues relevant to deciding the Motion to Stay. Defendants submit that, as a result, consideration of the reply memorandum will assist the Court in its decision on the motion. The proposed reply memorandum is attached as **Exhibit 1**.

4. Counsel for Defendants consulted with counsel for Plaintiffs prior to filing this Motion, and counsel for Plaintiffs assented to this Motion.

WHEREFORE, Defendants, The Lowell Five Cent Savings Bank, David Wallace, and John Pratt, Jr. respectfully request the Court enter an order permitting it leave to file a reply memorandum no longer than 7-pages in support of its Motion to Stay.

**Local Rule 7.1(a)(2) Certification**

Defendants certify that they have conferred with Plaintiffs in a good faith attempt to resolve or narrow the issues herein, and Plaintiffs have consented to this Motion.

Respectfully submitted,  
The Defendants,  
THE LOWELL FIVE CENT SAVINGS  
BANK, DAVID WALLACE, AND  
JOHN PRATT, JR.,

By their counsel,

/s/ Daniel R. Sonneborn  
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Dated: November 21, 2024

**CERTIFICATE OF SERVICE**

I certify that on November 21, 2024, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and electronic copies will be sent to those indicated as non-registered participants.

/s/ Daniel R. Sonneborn  
Daniel R. Sonneborn